

REMARKS

The Office Action dated February 27, 2008 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 31-54 and 61 have been amended to more particularly point out and distinctly claim the subject matter of the invention. Claims 55-60 have been cancelled without prejudice or disclaimer. New claims 62-77 have been added. No new matter has been added. Therefore, claims 31-54 and 61-77 are currently pending in the application and are respectfully submitted for consideration.

The Office Action rejected claims 31-32, 51, and 55-56 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Office Action alleged that there is no support in the specification for “said request prompting the user of the slave user equipment to send user information for group establishment in a second communications network,” and “using the second communications network for group communication of the group,” as recited in claims 31, 32, 51, and 55-56. Applicants respectfully submit that claims 31, 32, 51, and 55-56 have been amended to remove the limitations “said request prompting the user of the slave user equipment to send user information for group establishment in a second communications network,” and “using the second communications network for group communication of the group.” Thus, said claim amendments effectively moot the rejection. Accordingly, Applicants respectfully request that the rejection be withdrawn.

The Office Action rejected claims 37, 39-40, 46-47, 49-50, 53-54, 57, and 60-61 under 35 U.S.C. § 112, second paragraph as being indefinite. Specifically, the Office Action alleged that there was insufficient antecedent basis for “the communication medium,” as recited in claims 39, 46-47, 49, and 53; “the communications network,” as recited in claims 37, 40, 50, 54, and 60; “the short-range communications medium,” as recited in claim 57, and “the second mobile network,” as recited in claim 61.

With respect to claims 39, 46-47, 49, and 53, said claims have been amended to recite “the first communication network,” rather than “the communication medium.” With respect to claim 37, said claim has been amended to recite “at least one of the first communication network, and the second communication network,” rather than “from at least one of the communications network.” With respect to claims 40 and 54, said claims have been amended to recite “the first communications network,” rather than “the communications network.” With respect to claim 50, said claim has been amended to recite “the second communications network,” rather than “the first communications network.” With respect to claim 61, said claim has been amended to recite “the second communications network,” rather than “the second mobile network.” With respect to claims 57, and 60, said claims have been cancelled.

Applicants respectfully submit that the claim amendments and claim cancellations discussed above effectively moot the rejection. Accordingly, Applicants respectfully request that the rejection be withdrawn.

The Office Action rejected claims 31-43 and 45-61 under 35 U.S.C. § 102(a) as being allegedly anticipated by U.S. Patent No. 7,002,942 ("Kotzin"). Applicants respectfully submit that said claims recite allowable subject matter for at least the following reasons.

Claim 31, upon which claims 33-50, 61, and 74 are dependent, recites a method, which includes sending a request for group establishment from one user equipment acting as a master user equipment to at least one slave user equipment over a first communications network, and receiving from the at least one slave user equipment a response comprising information on a user for group establishment, over the first communications network. The method further includes creating, by the master user equipment, the group based on the information received in responses from the at least one slave user equipment, the group comprising the master user equipment and the at least one slave user equipment, and sending, by the master user equipment, the information on the created group to a group management server in a second communications network for establishing the communications group in the second communications network comprising user equipments.

Claim 32 recites a method, which includes sending a request for group establishment from a master user equipment to at least one slave user equipment over a first communications network, and receiving from the at least one slave user equipment over the first communications network a response comprising information on a user for group establishment. The method further includes creating, by the master user

equipment, the group based on the information received in responses from the at least one slave user equipment, the group comprising the master user equipment and the at least one slave user equipment, and sending, by the master user equipment, the information on the created group to all members of the group over a second communications network.

Claim 51, upon which claims 53-54 are dependent, recites an apparatus, which includes means for sending a request for group establishment to at least one slave user equipment over a first communications network, and means for receiving from at least one slave user equipment over the first communications network a response comprising information on user for group establishment. The apparatus further includes means for creating the group based on the information received in responses from the at least one slave user equipment, and means for sending the information on the created group to a group management server in a second communications network for establishing said group.

Claim 52 recites an apparatus, which includes means for sending a request for group establishment to at least one slave user equipment over a first communications network, and means for receiving from at least one slave user equipment over the first communications network a response comprising information on a user for group establishment. The apparatus further includes means for creating the group based on the information received in responses from the at least one slave user equipment, and means for sending the information on the created group to all members of the group via the first communications network.

Claim 62, upon which claims 75-77 are dependent, recites an apparatus, which includes a first transceiver configured to send a request for group establishment to at least one slave user equipment over a first communications network, and a receiver configured to receive from at least one slave user equipment over the first communications network a response comprising information on user for group establishment. The apparatus further includes a grouping unit configured to create the group based on the information received in responses from the at least one slave user equipment, and a second transceiver configured to send the information on the created group to a group management server in a second communications network for establishing said group.

Claim 63 recites an apparatus, which includes a first transceiver configured to send a request for group establishment to at least one slave user equipment over a first communications network, and a receiver configured to receive from at least one slave user equipment over the first communications network a response comprising information on a user for group establishment. The apparatus further includes a grouping unit configured to create the group based on the information received in responses from the at least one slave user equipment, and a second transceiver configured to send the information on the created group to all members of the group via the first communications network.

Claim 64 recites a computer program embodied on a computer readable medium for controlling a computer to perform a method. The method includes sending a request for group establishment from one user equipment acting as a master user equipment to at

least one slave user equipment over a first communications network, and receiving from the at least one slave user equipment a response comprising information on a user for group establishment, over the first communications network. The method further includes creating, by the master user equipment, the group based on the information received in responses from the at least one slave user equipment, the group comprising the master user equipment and the at least one slave user equipment, and sending, by the master user equipment, the information on the created group to a group management server in a second communications network for establishing the communications group in the second communications network comprising user equipments.

As will be discussed below, Kotzin fails to disclose or suggest all of the elements of the claims, and therefore fails to provide the features discussed above.

Kotzin generally discloses a method and apparatus which splits information into subsets of information to be communicated for a wireless apparatus. The split information is transmitted to a plurality of proximal wireless units. The plurality of proximal wireless units convey at least some of the transmitted split information to a destination wireless apparatus. The splitting operation is used in both uplink and downlink communications. (see Kotzin at Abstract).

Applicants respectfully submit that Kotzin fails to disclose, teach, or suggest, all of the elements of the present claims. For example, Kotzin fails to disclose, teach, or suggest, at least, *“sending a request for group establishment from one user equipment acting as a master user equipment to at least one slave user equipment over a first*

communications network,” “receiving from the at least one slave user equipment a response comprising information on a user for group establishment, over the first communications network,” and “sending, by the master user equipment, the information on the created group to a group management server in a second communications network for establishing the communications group in the second communications network comprising user equipments,” as recited in independent claim 31, and similarly recited in independent claims 32, 51-52, and 62-64.

Regarding “receiving from the at least one slave user equipment a response comprising information on a user for group establishment, over the first communications network,” Kotzin fails to disclose or suggest information regarding a user. On the contrary, Kotzin discloses that the wireless area network system 104 generates a user record for the wireless unit 106a identifying the type of reward. (see Kotzin at col. 6, lines 6-8). Moreover, Kotzin discloses that the wireless unit 106 also broadcasts, or otherwise provides, through peer-to-peer communication protocols, a message for one or more proximal units in the wireless local area network communication system 102 indicating an amount of bandwidth that the wireless apparatus 106a can share with proximal wireless unit 106b-106n. (see Kotzin at col. 6, lines 19-25).

In contrast, independent claim 1 recites “receiving from the at least one slave user equipment a response comprising information on a user for group establishment, over the first communications network.” Independent claims 32, 51-52, and 62-64 recite similar limitations. According to exemplary embodiments of the invention, information on a

user includes names of the users, their nicknames, and identification codes. (see Specification at page 1, lines 24-27). Furthermore, according to embodiments of the invention, the group information contains information on a user. (see Specification at page 4, lines 2-14). This is distinct from the teaching of Kotzin, wherein group information is information on the amount of bandwidth being shared.

Furthermore, the Office Action took the position that the responses 502a-d of Kotzin disclose a response comprising user information for group establishment. (see Office Action at page 5; see also Kotzin at col. 8, line 67 – col. 9, line 11). However, Applicants respectfully submit that Kotzin fails to disclose, or suggest, that any of the responses 502a-d include information of each respective user.

Regarding “*sending a request for group establishment from one user equipment acting as a master user equipment to at least one slave user equipment over a first communications network*,” Applicants respectfully submit that Kotzin fails to disclose that the signal that wireless unit 106a sends to wireless unit 106b is a request for group establishment.

Finally, regarding “*sending, by the master user equipment, the information on the created group to a group management server in a second communications network for establishing the communications group in the second communications network comprising user equipments*,” Applicants respectfully submit that Kotzin fails to disclose that wireless unit 106a sends information to a group management server. On the

contrary, wireless unit 106a merely broadcasts a message for one or more proximal units in the wireless local area network communication system 102.

Therefore, for at least the reasons discussed above, Kotzin fails to disclose, teach, or suggest, all of the elements of independent claims 31-32, 51-52, and 62-64. For the reasons stated above, Applicants respectfully request that this rejection be withdrawn.

Claims 33-43, 45-50, 61, and 74 depend upon independent claim 31. Claims 53-54 depend upon independent claim 51. Claims 75-77 depend upon independent claim 62. Claims 65-73 depend upon independent claim 64. Thus, Applicants respectfully submit that claims 33-43, 45-50, 61, and 65-77 should be allowed for at least their dependence upon independent claims 31, 51, 62, and 64, and for the specific elements recited therein.

The Office Action rejected claim 44 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Kotzin, in view of U.S. Publication No. 2002/0034959 (“Jamieson”). The Office Action took the position that Kotzin discloses all the elements of the claims with the exception of “the identification is an MSISDN number.” The Office Action then cited Jamieson as allegedly curing the deficiencies of Kotzin. Applicants respectfully submit that said claims recite allowable subject matter for at least the following reasons.

The description of Kotzin, as discussed above, is incorporated herein. Jamieson generally discloses a method of transferring data signals between a primary station and secondary stations of a master/slave radio network. The primary station assigns the secondary stations to a plurality of categories. The primary station transmits beacon signals containing indications of those categories. A secondary station receives the

beacon signals and determines if there is an indication of its category in a received beacon signal. If so, it transmits a request including an indication of its identity. The primary station checks to see if it has a data packet for the identified second station. If it has, it transmits the data packet. If not, it transmits a negative acknowledgment. (see Jamieson at Abstract).

Claim 44 depends upon independent claim 31. As discussed above, Kotzin does not disclose, teach, or suggest all of the elements of independent claim 31. Furthermore, Jamieson does not cure the deficiencies in Kotzin as Jamieson also does not disclose, teach, or suggest, at least, *“sending a request for group establishment from one user equipment acting as a master user equipment to at least one slave user equipment over a first communications network,” “receiving from the at least one slave user equipment a response comprising information on a user for group establishment, over the first communications network,” and “sending, by the master user equipment, the information on the created group to a group management server in a second communications network for establishing the communications group in the second communications network comprising user equipments,”* as recited in independent claim 31. Thus, the combination of Kotzin and Jamieson does not disclose, teach, or suggest all of the elements of claim 44. Additionally, claim 44 should be allowed for at least its dependence upon independent claim 31, and for the specific elements recited therein.

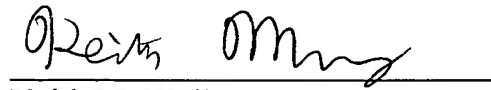
For at least the reasons discussed above, Applicants respectfully submit that the cited prior art references fails to disclose or suggest all of the elements of the claimed

invention. These distinctions are more than sufficient to render the claimed invention unanticipated and unobvious. It is therefore respectfully requested that all of claims 31-54 and 61-77 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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Enclosures: Petition for Extension of Time
Additional Claim Fee Transmittal
Check No. 019119